AIR & RADIATION DIVISION 2021 POST-AWARD MONITORING PLAN FOR GRANTS AND COOPERATIVE AGREEMENTS

Purpose

This document establishes the requirements for post award monitoring of active grants, and/or cooperative agreements by EPA Region III's Air & Radiation Division (ARD), in accordance with EPA Order 5700.6 A2 CHG 2, *Policy on Compliance, Review and Monitoring*.

Applicability

This policy applies to all grants and cooperative agreements monitored after January 1, 2021.

Baseline Monitoring

Baseline monitoring is the minimum monitoring that will take place on every award managed by the Air & Radiation Division. Baseline Monitoring will include ensuring, to the best of our ability, that programmatic award terms and conditions are satisfied, monitoring progress of a grant's work plan, reviewing financial drawdown reports to determine whether budget actions are consistent with the project's progress, receipt and acceptance of progress reports, and quality assurance requirements. ARD Project Officers (PO) will ensure that progress reports are received and monitor how the recipient is performing against the statement of work or work plan. For the Section 105 and State Indoor Radon Program grants, the PO will coordinate with the appropriate Director and Technical Program Specialists in evaluating performance based on a joint evaluation (midyear review). These reviews will also ascertain the amount of funds the recipient is receiving and whether programmatic terms and conditions are being met. POs will contact GAMB should any problems occur.

Advanced Monitoring

In addition to the baseline monitoring, ARD will perform advanced evaluative programmatic reviews on 10% percent of its grant/cooperative agreement recipients. ARD will carry out these evaluative reviews (minimum requirement is **two (2) for calendar year (2021)** using the protocol contained in EPA Order 5700.6 A2 CHG 2.

Advanced Monitoring is the process by which a recipient's compliance with applicable programmatic and financial statutes, regulations, conditions, and policies is validated. ARD has identified the grant recipients planned for Advanced Monitoring for 2021. ARD is committed to performing two (2) Advanced Monitoring Reviews in 2021. These reviews will be held via on-site visits. A list of grants proposed for programmatic advanced monitoring reviews is provided in Table A.

Table A 2021 Advanced Monitoring Selections

Grant Number: XA96388301 Grantee: VADEQ Program: Community-Scale Air Toxics Ambient

Monitoring (CSATAM)

PO: Amanda McCullough Start Date: 10/01/2020 End Date: 09/30/2023

Type of Review: Desk

Description: The grant funds will support the Virginia Department of Environmental Quality (DEQ) Office of Air Quality Monitoring (OAQM) for a Community Scale Air Toxics Monitoring project for the Southeastern (Tidewater) Area of the Commonwealth of Virginia. This project is intended to characterize the ambient concentrations of air toxics metals and perform corresponding air quality and health risk assessments for two Tidewater communities: the Lambert's Point Community (LP) and Southeast community (SE) located in Norfolk and Newport News, respectively. This project is designed to develop a local air quality characterization in these communities and perform an air quality and a health risk assessment for air toxics metals. The results of this characterization and the air quality and health assessments will inform future DEQ Strategic Plan objectives to improve air quality and community engagement in underserved communities.

Grant Number: DS96360201 Grantee: DOEE Program: DERA State Program

PO: Alison Riley Start Date: 10/1/18 End Date: 09/30/21

Type of Review: Desk

Description: This agreement will provide assistance to DC-DOEE in its efforts to reduce diesel emissions and exposure throughout the District of Columbia. The replacement and retrofitting of one genset engine and up to 82 other vehicles will reduce emissions of diesel particulate matter and other pollutants.

In making selections of proposed assistance agreements for review, ARD applied the following criteria:

- Program Area
- Grants experiencing delays
- Grant Administration & Financial Accountability

ARD Senior Project Officer, Paula Krall will continue to serve as the primary point of contact for monitoring POs progress in meeting advanced monitoring commitments and ensuring the POs advanced monitoring reports (i.e. summary report and email verification-grantee receipt of report) will be completed and uploaded to COMPLY no later than **December 31, 2021**.

Follow-up on advanced monitoring findings will be included in the advanced monitoring report. ARD POs will be responsible for tracking progress made in addressing issues identified in the report. In cases where advanced monitoring reviews reveal grantee problems requiring corrective action (s), the resolution of the action(s) is expected within 120 calendar days of the report date. The resolution of the problem will be documented in COMPLY prior to closing out the report.

Changes to Assistance Agreements

POs will initiate actions in a timely fashion when it is necessary to change assistance agreements. POs and the recipient Project Managers should discuss any necessary changes and if agreed on, the changes should be communicated to GAMB.

Non-compliance with Award

It is ARD's policy to resolve non-compliance issues as quickly as possible and at the lowest level possible (i.e., between the project officer and the principal investigator). All non-compliance issues are to be communicated to the recipient in writing, and a remedy proposed. Remedies for non-compliance with award terms and conditions will vary according to the circumstances. ARD project officers should discuss non-compliance issues with their managers, and grant specialists, for their assistance in resolving non-compliance issues.

Training

All POs will be provided any changes in the requirements in post-award monitoring activities, including baseline monitoring and advanced monitoring and policy changes by the Senior Project Officer. ARD will ensure that the POs are updated and keep their PO certification current by taking the required refresher training.

Close-outs

POs must ensure the adequacy of the recipient's final technical report (FTR) and provide any other information, such as disposition of equipment if applicable, in order to facilitate a timely close-out of the assistance agreement. The PO should seek the assistance of the Grants Management Specialist when needed. After the FTR is received and found to be acceptable, the PO will contact GAMB immediately to certify the receipt and acceptance of the FTR.

Communications Strategy

Electronic copies of the ARD 2021 plan will be uploaded to the ARD SharePoint site available to all project officers and management.

ARD Grant Resource Tracking Database

Granttrax is ARDs primary grants online database application that provides ARD POs and management with quick access to ARD grants and grant-related information. Granttrax tracks contains several key parameters for ARD grant actions including award date, federal & state award amounts, program, balances, post award monitoring actions, start and end dates, and QAPPs. The system is web-based, easy to use and provides a number of different reports and graphical charts that visualize and summarize the division's grants data.

Granttrax also includes a powerful search feature that can rapidly locate any grant in the system based on keyword, program, grantee, project officer, and/or award date. Granttrax is located on the agency intranet at [HYPERLINK "http://r3web2.r03.epa.gov/air/grants/reports/index.cfm"].

2020 Post -Award Monitoring Activities

Advanced Monitoring Activities

Advanced Monitoring was conducted on two (2) **ARD grants** for calendar year 2020. This fulfilled the Agency's 10% requirement of programmatic reviews. The requirement was two. **A list of these reviews can be found in Table B below.**

Table B 2020 Advanced Monitoring Reviews Conducted

Overall Results of Reviews of 2020 Advanced Monitoring Selections

Nonresponsive based on revised scope